

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

Vs.

No. 2:13-cv-02289 SHL - dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants.

**DEFENDANTS' PEDIATRIC ANESTHESIOLOGISTS, PA AND BABU RAO
PAIDIPALLI, M.D.'S ADDITIONAL VOIR DIRE QUESTIONS**

Come now the Defendants, Pediatric Anesthesiologists, PA and Babu Rao Paidipalli, M.D, and proposes the following additional voir dire questions:

1. Dr. Paidipalli speaks English very well having lived here for many decades; however, it is not his native tongue, having been born in India. Does anyone believe they will have difficulty understanding Dr. Paidipalli and that would prejudice them in any way?
2. Do you, any family members or close friends, have experience in the medical field-doctor, nurse, physical therapist, etc.?
3. How many of you would say you personally, or someone you care about, has experienced bad medical care? Was the experience with the doctor? With a nurse? At a hospital? How many of you are still bothered by that experience?

4. Who here believes that doctors today can always prevent bad outcomes for patients?

5. Who here believes that if a patient has a bad outcome at a hospital, the doctor always has some responsibility for that outcome?

6. Has anyone undergone a surgical procedure under general anesthesia?

7. Have you or a member of your family had a bad experience with anesthesia?

8. Who here has children that you raised or are in the process of raising right now?

9. Have you had a child who has undergone a tonsillectomy and/or adenoidectomy?

10. Has anyone ever been a patient at Le Bonheur Children's Hospital?

11. Has anyone had a child that was a patient at Le Bonheur Children's Hospital?

12. Has anyone had a child that has undergone any surgical procedure under general anesthesia?

13. Is there anything about the experience you or a family member has had undergoing surgery or general anesthesia that would affect your ability to listen to the facts and evidence and fairly decide this case?

14. Have any of you recently lost a loved one? Is there anything about that experience that would affect your ability to fairly judge this case?

15. Have your or anyone close to you (family or close friend) suffered the loss of a child?

16. Do any of you feel that you would not be able to put aside sympathy for these parents who have lost their child and fairly judge this case?

By: W. Bradley Gilmer
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served via U.S. Mail to all counsel of record identified below:

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this 6th day of January, 2015.

s/ W. Bradley Gilmer
W. BRADLEY GILMER